

AO 91 (Rev. 11/11) Criminal Complaint

**FILED**  
 UNITED STATES DISTRICT COURT  
 ALBUQUERQUE, NEW MEXICO

## UNITED STATES DISTRICT COURT

for the

District of New Mexico

SEP 19 2019

MITCHELL R. ELFERS  
 CLERK

United States of America )

v. )

Anthony Paul SALAZAR )

Case No. 19mj3233

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 19 September 2019 in the county of San Miguel in the  
       District of New Mexico, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. § 841

Possession with Intent to Distribute Cocaine Base.

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

Electronically submitted &  
 telephonically sworn to me  
 on September 19, 2019. KBM

~~Sworn to before me and signed in my presence.~~Date: 09/19/2019City and state: Albuquerque, NM


Complainant's signature

MICHAEL MOSTAGHNI, Special Agent, FBI

Printed name and title



Judge's signature

KAREN B. MOLZEN US MAGISTRATE JUDGE

Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Michael Mostaghni, being duly sworn, depose and state:

1. I have been a law enforcement officer for approximately three years and am employed as a Special Agent with the Federal Bureau of Investigation (FBI). I am assigned to the Safe Streets High Intensity Drug Trafficking Area Gang Task Force (SSGTF) at the Albuquerque Field Office of the FBI. I primarily investigate transnational organized crime, gang-criminal enterprises, and drug trafficking organizations involved in unlawful possession of firearms, distribution of controlled substances, racketeering activities, and conspiracies associated with these offenses. I have received on the job training from other experienced agents, detectives, and correctional officers in the investigation of gangs and criminal organizations. My investigative training and experience includes, but is not limited to, interviewing subjects, targets, and witnesses; writing affidavits for and executing search and arrest warrants; managing cooperating sources; collecting evidence; conducting surveillance; and analyzing public records.
2. This affidavit is submitted in support of a criminal complaint charging Anthony Paul SALAZAR (hereinafter A. SALAZAR), born in 1996, with a violation of 21 U.S.C. § 841, that being Possession with Intent to Distribute Cocaine Base.

**INVESTIGATION**

3. On Thursday, September 19, 2019, at approximately 7:20 AM, The Federal Bureau of Investigation (FBI) and New Mexico State Police (NMSP) executed a United States District Court search warrant at 1200 Commerce Street, #8, City of Las Vegas and County of San Miguel in the State of New Mexico. The FBI Tactical Team detained two subjects they recovered from inside the residence to be searched. Those individuals were identified as Christopher Salazar and A. SALAZAR.

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

4. The residence being searched was a single wide modular home. In the living room area of the residence, investigators located a wallet on a red couch and inside the wallet was a New Mexico identification card along with a large amount of US Currency – specifically \$2,471.00. The NM identification card inside the wallet belonged to A. SALAZAR and it contained several additional cards in A. SALAZAR'S name. Investigators located a small grey film container on the floor, and in close proximity to, the wallet. Investigators discovered numerous individual foil bindles inside the film container. The small foil bindles contained what appeared to be a white powdery substance consistent with methamphetamine or crack. I know through training and experience that narcotics dealers package suspected illegal narcotics in this fashion for the purposes of individual sale.

5. New Mexico State Police (NMSP) conducted a narcotics field test of the white powdery substance located in the film container and the substance tested positive for cocaine. Investigators counted 31 individual bindles, approximately 31 grams of cocaine, in the grey film container, each of which contained the white substance, which investigators identified as crack cocaine.

6. Investigators continued searching the living room and located a small digital scale in the top dresser drawer in the living room. Portable digital scales are often employed by narcotics traffickers to weigh out specific quantities of narcotics for future sales or to confirm the amount purchased. Investigators also located a second digital scale along with two rolls of aluminum foil in a cabinet in the kitchen area. Both digital scales were removed and secured as evidence. The aluminum foil was photographed as well as the US Currency (totaling \$2,471.00). Investigators left the US Currency with Christopher SALAZAR.

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**


7. A. SALAZAR was interviewed at the NMSP Office in Las Vegas. He was advised of rights pursuant to Miranda and agreed to speak with investigators. In the interview, A. SALAZAR admitted the aluminum bindles located in the film container did in fact contain cocaine and that he sells those bindles of cocaine for \$10.00 per bindle.

**CONCLUSION**

8. Based on the above information, there is probable cause to believe that A. SALAZAR has committed a violation of 21 U.S.C. § 841 that being in Possession with intent to distribute cocaine base. This Complaint was approved for submission to the Court by AUSA Randy Castellano/Maria Armijo.

Respectfully submitted,

*Electronically submitted  
and telephonically sworn  
to me this day. KBM*

  
\_\_\_\_\_  
Michael Mostaghni  
FBI Special Agent

~~Subscribed and sworn to before me on~~ September 19, 2019:

  
\_\_\_\_\_  
THE HONORABLE KAREN B. MOLZEN  
UNITED STATES MAGISTRATE JUDGE